March 13, 1998

Exhibit "B"

EXHIBIT B

Date: Tue, 17 Feb 1998 17:05 -0600 (CST)
From: "RYDMAN, MICHAEL A" <mr7508@txmail.sbc.com>
To: Dick Dowd <dick.dowd@mci.com>
Return-Receipt-To: "RYDMAN, MICHAEL A" <mr7508@txmail.sbc.com>
Subject: RE: Houston, Texas Inter-Company Network Testing Summary Week 2

Dick

The wording on our problem describes it just fine. The tests that we've completed at this point are listed below under SWB. We cannot show Call Through tests complete overall due to Winstar's problem. We will provide a detailed summary by CLEC next week to show the progress that has been made.

Mike

> ----------
> From: Dick Dowd[SMTP:dick.dowd@mci.com]
> Sent: Tuesday, February 17, 1998 3:39 PM
> To: ""RYDMAN@mci.com; RYDMAN, MICHAEL A
> Subject: Houston, Texas Inter-Company Network Testing Summary
> Week 2
> Importance: High
>
> Mike,
>
> For the second week in a row I have not received a testing summary
> from SWB. Therefore I wrote what I believe to be the problem in this
> report. Please read and get back to me prior to 4:30 today if you
> approve of my wording.
>
> Dick
>
> Forwarded message:
>
> To: Ralph Albright <ralph.albright@alltel.com>
> To: Rick Allen <ral315@txmail.sbc.com>
> To: Ken Barnes <ken.barnes@alltel.com>
> To: Patrick Brazil <pbrazil@lctx.com>
> To: debbie cathey <dcathey@wlb.ho.att.com>
> To: Clark Cooper <cc756@sbc.com>
> To: Marty Detling <martin.l.detling@alltel.com>
> To: Eugene Duffy <eduffy@choicecom.net>
> To: Brenda Flood <brenda.flood@wcom.com>
> To: Kathleen Hartley <khartley@winstar.com>
> To: Tom Karins <tkarins@brooks.net>
> To: karen.kay <karen.kay@twcable.com>

> To: Dawn Lawrence <dlawrence1@brooks.net>
> To: Harold McKenzie <hlmac@gte.net>
> To: Hampton Oberle <554-8404@mcimail.com>
> To: John Onofrey <john.onofrey@alltel.com>
> To: Warren Potts <warren.potts.ntwkgd@igate.sprint.com>
> To: ""RYDMAN
> To: MICHAEL A"" <mr7508@txmail.sbc.com>
> To: Toni Sanders <ts9475@txmail.sbc.com>
> To: Kedar Sant <ksant@att.com>
> To: Shelly Shaw <shelly.shaw@wcom.com>
> To: Johm Skidmore <jskidmore@amtelco.com>
> cc: Carolyn Bizilia <Carolyn.Bizilia@mci.com>
> cc: Suzanne Brooks <Suzanne.Brooks@mci.com>
> cc: Cindy Brown <215-7674@mcimail.com>
> cc: "CASTEEL, DONALD C" <DC4585@txmail.sbc.com>
> cc: Don Dabney <dd2849@txmail.sbc.com>
> cc: David Heath <444-2882@mcimail.com>
> cc: Jim Joerger <Jim.Joerger@MCI.Com>
> cc: Mark Lancaster <lancaster@bsi.att.com>
> cc: Maggie Lee <mlee@illuminetss7.com>
> cc: madole <madole@att.com>
> cc: Steve Markowski <smarkowski@npac.com>
> cc: 'Melissa May' <melissa.may@mci.com>
> cc: Ron Rotondi <Ron.Rotondi@MCI.Com>
> cc: william seidler <w.seidler@att.com>
> cc: Shelly Shaw <NPC_dallas@hotmail.com>
> cc: John F. Shea <jfshea@worldnet.att.net>
> cc: Rebecca Stillings <rstillings@illuminetss7.com>
> cc: Jan Trout-Avery <jan.trout-avery@npac.com>
> cc: Anne A. Turner <385-1465@mcimail.com>
> cc: 'Robin Walker-Cameron' <Robin.Walker@mci.com>
> Subject: Houston, Texas Inter-Company Network Testing Summary Week 2
> Week two of the Houston, Texas LNP Inter-company Network testing
> involved call through testing, starting with basic calls. Testing
> moves progressively from basic call through tests and on to CLASS,
> LIDB, Operator Assisted Calls, etc. February 27 is the target date
> for completion of the Houston testing. AT&T, American Telco, GTE,
> Lufkin-Conroe, MCI, Southwest Bell, Time Warner Communications,
> WinStar
> and WorldCom are all taking part in this inter-company network test
> of LNP in the Houston area.
>
> South West Bell experienced a problem with their LIDB and had been
> working the problem all week. As of Thursday afternoon they received
> information from their vendor that their problem would require a point
> release to the STP/db software. The problem as explained by South
> West Bell in a separate memo is as follows:
>
> SWB initially selected the ISCP with Bellcore software for our LNP

> database, but after looking at all the options, DSC provided an
> option for an LNP database that used existing STPs without
> complicating
> the network with additional network elements. In addition, SWB found
> out that with our SS7 network design, using ISCPs, we would have
> instances
> where LIDB queries would extend beyond the 2 second time limit causing
>
> time-outs for some calls. The DSC solution also solved this problem.
>
> The DSC STP integrated STP solution for LNP simply adds a few more
> existing
> circuit packs into existing shelves to provide the LNP database
> function.
> Once the software is loaded and the new packs are installed, each GTT
> table for every service that contains ported NPA NXXs is marked as a
> large
> model. When an LNP, CLASS, LIDB, or ISVM query is received by the
> STP,
> it is sent to the Distributed SS7 Services (DSS) section, which is the
>
> LNP database located in the STP, to look for a ten digit ported number
>
> (the numbers flow to the STP from the LSMS via NetPilot). If the
> number
> is found, the query is routed based on the ported number information.
>
> If the number is not found, the query is sent back to the original GTT
>
> and routed to the normal route in the table. Because the STP now
> serves as
> an LNP database, DSC developed software that allows the STP to have
> more than one alias point code. This is necessary to avoid transfer
> prohibits to normal ISUP routing in the event of LNP database
> overload.
>
> SWB received the new STP software, in January, early enough to run
> tests
> in the lab and in an FVO site. However, the SSPs had to convert to
> the
> new alias for CLASS, LIDB, and ISVM, before the GTTs could be changed
> to
> the large model. SWB had an aggressive schedule to do this but was
> unable
> to complete the conversion and turn on the LIDB GTT until the last
> week of
> January because of the TOPs machines schedule to change to the new
> alias
> point codes. When we did turn on the LIDB GTT as a large model for

> LNP,
> AIN services that use the LIDB database failed and caused customer
> trouble reports. In addition, SWB later found out that during time
> we also had around 2000 credit card pin errors. It took quite some
> time
> to isolate the problem to the STP software, but DSC finally isolated
> it
> to the DSS software. They began to determine if the code could be
> patched or would require a new release of software because of more
> complex changes. It wasn't until Thursday that SWB found out that it
> would require a new release of software.
>
> The industry has completed several studies to determine the root
> cause of SS7 caused outages in the past few years. New STP software
> is
> one of the areas that has been suggested as being one of the most
> critical for proper regression testing. SWB will be thoroughly
> testing
> the new software release in the lab prior to installing it into our
> working network. DSC will be working with SWB to ensure that no
> time is lost. Because of our network layout, both regional STP pairs
> and the
> Houston STPs will require the new software prior to our Inter-company
> LIDB tests being completed.
>
> SWB will ask for a waiver of March 31 given the schedule of software
> SWB is receiving from DSC for our STPs.
>
> Service Provider's Summary of Testing Results for the Week of Feb 2
> thru Feb 6.
>
> American Telco's - ATI experienced porting challenges 2/9 which
> were resolved 2/10 after working with SWB SS7 group. We had an
> internal routing problem which we fixed and then started test calls.
>
> Basic test calls, local, inter-lata and intra-lata, ported
> number-to-ported number, nonported-to-ported, and ported-to-nonported
> completed successfully.
>
> Operator test calls failed until SWB updated the tables in the TOPS
> switch
> to include ported-in NPA-NXX's for American Telco.
>
> Caller ID tests calls ok with SWB but not LC.
>
> Caller name tests fail (ATI uses SWB's LIDB).
>
> 911 tests ok.
>

> AT&T's - AT&T has completed the following test cases (successfully)
>
> 4.5.1.1.10
> 4.5.1.1.13
> 4.5.1.1.28
> 4.7.3
> 4.5.7.1.1
> 4.5.7.1.4
>
> Most of these test cases were run multiple times to the various providers.
>
> GTE's - 4.1.1.1, 4.1.1.2, 4.1.1.3, 4.2.1, 4.2.1.1, 4.2.1.1.2, 4.2.1.1.3, 4.2.1.1.4, 4.2.1.1.5, 4.2.1.1.6, 4.2.3, 4.2.3.1, 4.2.3.2.2, 4.2.4, 4.2.4.1, 4.2.4.1.1, 4.2.4.1.1.1, 4.2.4.1.1.2, 4.2.4.1.1.3, 4.2.4.1.1.4, 4.2.4.1.1.5, 4.2.4.2, 4.2.4.3, 4.2.4.3.1, 4.2.4.2.1, 4.2.4.2.2, 4.2.4.2.3, 4.2.5, 4.2.5.1, 4.3, 4.3.1, 4.3.2, 4.3.3, 4.3.3.1.1, 4.3.3.1.2, 4.3.3.1.3, 4.3.4, 4.4.1, 4.4.1.1.2, 4.4.1.1.4, 4.4.2.1.1, 4.4.3.1.1, 4.4.4.1.1, 4.5.1.1.1, 4.5.1.1.2, 4.5.1.1.4, 4.5.1.1.10, 4.5.1.1.13, 4.5.1.1.18, 4.5.1.1.19, 4.5.1.1.21, 4.5.1.1.26, 4.5.1.1.27, 4.5.1.1.28, 4.5.1.1.29, 4.5.1.1.31, 4.5.1.7.1, 4.5.1.7.2, 4.5.1.7.3, 4.5.3.1.1, 4.5.3.2.1, 4.5.3.3.1, 4.5.3.4.1, 4.5.3.7.1, 4.5.7.1.7, 4.7.1, 4.8.1.1.1, 4.8.1.1.2, 4.8.1.2.1, 4.8.1.2.2, 4.8.2.1.1, 4.8.2.1.3, 4.8.2.1.4, 4.8.2.1.5, 4.8.2.1.6, 4.8.3.1.1, 4.8.3.1.2, 4.8.3.1.3, 4.8.3.1.4, 4.8.4.1.1, 4.8.4.2.1, 4.8.5.1.1, 4.8.5.2.1
>
> Troubles that were resolved during testing:
>
> 4.3.2 Provisioning Process order flow and code opening. Code 409-856 was not opened by Illuminet. GTE provided incorrect DPC for LIDB.
> 4.4.1.1.4 Porting with unconditional 10 Digit trigger code was not open at the time.

> 4.5.1.1.4 Intra-Lata (SS7) Nonported number in an NPA-NXX
> open to portability to ported number. This was
> resolved with a temporary fix and referred to the
> manufacturer for perminate resolution in Willis.
> 4.5.3.7.1 Caller Name Delivery Ported Number to Ported Number.
> The ported in name was not added to the GTE database.
>
> Lufkin Conroe's - Lufkin-Conroe's Summary of Testing Results for
> the Week of Feb 9 thru Feb 13. Illuminent has opened our 409-539
> code in their LSMS database and as a result LCTX was able to move
> forward with the planned call through testing with GTE. Also later
> in the week LCTX did some call through testing with Worldcom,
> American Telco, and Time Warner Communications. These tests also
> seemed to work correctly. One problem that we were able to work
> out was when LCTX performed a query to Illuminent's database on a
> number that had been ported into our switch the query will perform
> a dip and bring back LCTX's LRN and ring the phone even thought the
> number was considered resident on our switch. Also, tests were
> performed
> that verified that our switch would handle default routes and
> database dips in order to complete the call to the appropriate
> switch. In relation to the passing of LSR's between GTE and LCTX,
> we worked with GTE on conflict resolution and discussed LSR
> corrections
> but we have still not received corrected LSR's back from GTE relating
> to the first ported number.
>
> MCI's - Events MCI completed during the week of 2/9:
>
> 4.3.4 Conflict Resolution w/SWB
> 4.5.1.1.10 Basic Intra-Lata SS7 P-P
> 4.5.1.1.13 Basic Intra-Lata SS7 NP-P
> 4.8.1.1.1 0+ Intra-Lata P-P
> 4.8.1.1.2 0+ Intra-Lata NP-P
> 4.8.2.1.1 0+ 3rd #
> 4.8.4.1.1 0+ collect
> 4.5.6.2.2 E911
>
> SWB's - The following tests were completed to all CLECs. Call through
> testing cannot be completed due to Winstar problem.
>

4.3.2
4.3.3.1.2
4.3.4
4.4.1.1.1
4.4.2
4.4.2.1.1

> TWC's - Time Warner has completed the following:
>
> Local and IXC calls to all ported numbers (except 713-475-0006
> WinStar.)
>
> Local and IXC calls from our SWBT and MCI donated numbers
>
> Collect and 3rd number billed call from AT&T to the MCI port in
> and
> SWBT port in numbers. Calls to the SWBT number failed.
>
> This week we are continuing our Operator calls and collect and
> 3rd
> number billed calls from the other participants. We will also be
>
> scheduling CLASS testing with SWBT.
>
>
> WorldCom's - No summary received.
>
>
> WinStar's - Second week in a row that no summary was received.
>
> Dick Dowd
> 972-498-5069
> V757-5069
> Fax 972-498-5022
> 1-800-PAGEMCI
> PIN 1742797
> dick.dowd@mci.com
>

March 13, 1998

Exhibit "C"

EXHIBIT "C"

Date: Wed, 18 Feb 1998 08:24 -0600 (CST)
From: Dick Dowd <dick.dowd@mci.com>
Organization: MCI
To: Ralph Albright <ralph.albright@alltel.com>,
Rick Allen <ra1315@txmail.sbc.com>,
Ken Barnes <ken.barnes@alltel.com>,
Patrick Brazil <pbrazil@lctx.com>,
debbie cathey <dcathey@wlb.ho.att.com>,
Clark Cooper <cc756@sbc.com>,
Marty Detling <martin.l.detling@alltel.com>,
Eugene Duffy <eduffy@choicecom.net>,
Brenda Flood <brenda.flood@wcom.com>,
Kathleen Hartley <khartley@winstar.com>,
Tom Karins <tkarins@brooks.net>,
karen.kay <karen.kay@twcable.com>,
Dawn Lawrence <dlawrence1@brooks.net>,
Harold McKenzie <h1mac@gte.net>,
Hampton Oberle <554-8404@mcimail.com>,
John Onofrey <john.onofrey@alltel.com>,
Warren Potts <warren.potts.ntwkgd@igate.sprint.com>,
""RYDMAN,
MICHAEL A"" <mr7508@txmail.sbc.com>,
Toni Sanders <ts9475@txmail.sbc.com>,
Kedar Sant <ksant@att.com>,
Shelly Shaw <shelly.shaw@wcom.com>,
Johm Skidmore <jskidmore@amtelco.com>
CC: Carolyn Bizilia <Carolyn.Bizilia@mci.com>,
Suzanne Brooks <Suzanne.Brooks@mci.com>,
Cindy Brown <215-7674@mcimail.com>,
"CASTEEL, DONALD C" <DC4585@txmail.sbc.com>,
Don Dabney <dd2849@txmail.sbc.com>,
David Heath <444-2882@mcimail.com>,
Jim Joerger <Jim.Joerger@MCI.Com>,
Mark Lancaster <lancaster@bsi.att.com>,
Maggie Lee <mlee@illuminetss7.com>,
madole <madole@att.com>,
Steve Markowski <smarkowski@npac.com>,
'Melissa May' <melissa.may@mci.com>,
Ron Rotondi <Ron.Rotondi@MCI.Com>,
william seidler <w.seidler@att.com>,
Shelly Shaw <NPC_dallas@hotmail.com>,
John F. Shea <jfshea@worldnet.att.net>,
Rebecca Stillings <rstillings@illuminetss7.com>,
Jan Trout-Avery <jan.trout-avery@npac.com>,
Anne A. Turner <385-1465@mcimail.com>,
'Robin Walker-Cameron' <Robin.Walker@mci.com>
Subject: Houston, Texas Inter-Company Network Testing Summary Week 2

Week two of the Houston, Texas LNP Inter-company Network testing

involved call through testing, starting with basic calls. Testing moves progressively from basic call through tests and on to CLASS, LIDB, Operator Assisted Calls, etc. February 27 is the target date for completion of the Houston testing. AT&T, American Telco, GTE, Lufkin-Conroe, MCI, Southwest Bell, Time Warner Communications, WinStar and WorldCom are all taking part in this inter-company network test of LNP in the Houston area.

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SWB initially selected the ISCP with Bellcore software for our LNP database, but after looking at all the options, DSC provided an option for an LNP database that used existing STPs without complicating the network with additional network elements. In addition, SWB found out that with our SS7 network design, using ISCPs, we would have instances where LIDB queries would extend beyond the 2 second time limit causing time-outs for some calls. The DSC solution also solved this problem.

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Once the software is loaded and the new packs are installed, each GTT table for every service that contains ported NPA NXXs is marked as a large model. When an LNP, CLASS, LIDB, or ISVM query is received by the STP, it is sent to the Distributed SS7 Services (DSS) section, which is the LNP database located in the STP, to look for a ten digit ported number (the numbers flow to the STP from the LSMS via NetPilot). If the number is found, the query is routed based on the ported number information.

If the number is not found, the query is sent back to the original GTT and routed to the normal route in the table. Because the STP now serves as an LNP database, DSC developed software that allows the STP to have more than one alias point code. This is necessary to avoid transfer prohibits to normal ISUP routing in the event of LNP database overload.

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to change to the new alias point codes. When we did turn on the LIDB GTT as a large model for LNP, AIN services that use the LIDB database failed and caused customer trouble reports. In addition, SWB later found out that during time we also had around 2000 credit card pin errors. It took quite some time to isolate the problem to the STP software, but DSC finally isolated it to the DSS software. They began to determine if the code could be patched or would require a new release of software because of more complex changes. It wasn't until Thursday that SWB found out that it would require a new release of software.

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SWB will ask for a waiver of March 31 given the schedule of software SWB is receiving from DSC for our STPs.

Service Provider's Summary of Testing Results for the Week of Feb 2 thru Feb 6.

American Telco's - ATI experienced porting challenges 2/9 which were resolved 2/10 after working with SWB SS7 group. We had an internal routing problem which we fixed and then started test calls.

Basic test calls, local, inter-lata and intra-lata, ported number-to-ported number, nonported-to-ported, and ported-to-nonported completed successfully.

Operator test calls failed until SWB updated the tables in the TOPS switch
to include ported-in NPA-NXX's for American Telco.

Caller ID tests calls ok with SWB but not LC.

Caller name tests fail (ATI uses SWB's LIDB).

911 tests ok.

AT&T's - AT&T has completed the following test cases (successfully)

4.5.1.1.10
4.5.1.1.13
4.5.1.1.28

4.7.3
4.5.7.1.1
4.5.7.1.4

Most of these test cases were run multiple times to the various providers.

GTE's -

4.1.1.1	4.2.5	4.5.1.1.29
4.1.1.2	4.2.5.1	4.5.1.1.31
4.1.1.3	4.3	4.5.1.7.1
4.2.1	4.3.1	4.5.1.7.2
4.2.1.1	4.3.2	4.5.1.7.3
4.2.1.1.2	4.3.3	4.5.3.1.1
4.2.1.1.3	4.3.3.1.1	4.5.3.2.1
4.2.1.1.4	4.3.3.1.2	4.5.3.3.1
4.2.1.1.5	4.3.3.1.3	4.5.3.4.1
4.2.1.1.6	4.3.4	4.5.3.7.1
4.2.3	4.4.1	4.5.7.1.7
4.2.3.1	4.4.1.1.2	4.7.1
4.2.3.2.2	4.4.1.1.4	4.8.1.1.1
4.2.4	4.4.2.1.1	4.8.1.1.2
4.2.4.1	4.4.3.1.1	4.8.1.2.1
4.2.4.1.1	4.4.4.1.1	4.8.1.2.2
4.2.4.1.1.1	4.5.1.1.1	4.8.2.1.1
4.2.4.1.1.2	4.5.1.1.2	4.8.2.1.3
4.2.4.1.1.3	4.5.1.1.4	4.8.2.1.4
4.2.4.1.1.4	4.5.1.1.10	4.8.2.1.5
4.2.4.1.1.5	4.5.1.1.13	4.8.2.1.6
4.2.4.2	4.5.1.1.18	4.8.3.1.1
4.2.4.3	4.5.1.1.19	4.8.3.1.2
4.2.4.3.1	4.5.1.1.21	4.8.3.1.3
4.2.4.2.1	4.5.1.1.26	4.8.3.1.4
4.2.4.2.2	4.5.1.1.27	4.8.4.1.1
4.2.4.2.3	4.5.1.1.28	4.8.4.2.1
		4.8.5.1.1
		4.8.5.2.1

Troubles that were resolved during testing:

4.3.2 Provisioning Process order flow and code opening. Code 409-856 was not opened by Illuminet. GTE provided incorrect DPC for LIDB.

4.4.1.1.4 Porting with unconditional 10 Digit trigger code was not open at the time.

4.5.1.1.4 Intra-Lata (SS7) Nonported number in an NPA-NXX open to portability to ported number. This was resolved with a temporary fix and referred to the manufacturer for perminate resolution in Willis.

4.5.3.7.1 Caller Name Delivery Ported Number to Ported Number.

The ported in name was not added to the GTE database.

Lufkin Conroe's - Lufkin-Conroe's Summary of Testing Results for the Week of Feb 9 thru Feb 13. Illuminent has opened our 409-539 code in their LSMS database and as a result LCTX was able to move forward with the planned call through testing with GTE. Also later in the week LCTX did some call through testing with Worldcom, American Telco, and Time Warner Communications. These tests also seemed to work correctly. One problem that we were able to work out was when LCTX performed a query to Illuminent's database on a number that had been ported into our switch the query will perform a dip and bring back LCTX's LRN and ring the phone even thought the number was considered resident on our switch. Also, tests were performed
that verified that our switch would handle default routes and database dips in order to complete the call to the appropriate switch. In relation to the passing of LSR's between GTE and LCTX, we worked with GTE on conflict resolution and discussed LSR corrections
but we have still not received corrected LSR's back from GTE relating to the first ported number.

MCI's - Events MCI completed during the week of 2/9:

4.3.4	Conflict Resolution w/SWB
4.5.1.1.10	Basic Intra-Lata SS7 P-P
4.5.1.1.13	Basic Intra-Lata SS7 NP-P
4.8.1.1.1	0+ Intra-Lata P-P
4.8.1.1.2	0+ Intra-Lata NP-P
4.8.2.1.1	0+ 3rd #
4.8.4.1.1	0+ collect
4.5.6.2.2	E911

SWB's - The following tests were completed to all CLECs. Call through testing cannot be completed due to Winstar problem.

4.3.2
4.3.3.1.2
4.3.4
4.4.1.1.1
4.4.2
4.4.2.1.1

TWC's - Time Warner has completed the following:

Local and IXC calls to all ported numbers (except 713-475-0006 WinStar.)

Local and IXC calls from our SWBT and MCI donated numbers

Collect and 3rd number billed call from AT&T to the MCI port in and SWBT port in numbers. Calls to the SWBT number failed.

This week we are continuing our Operator calls and collect and 3rd number billed calls from the other participants. We will also be scheduling CLASS testing with SWBT.

WorldCom's - No summary received.

WinStar's - Second week in a row that no summary was received.

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CERTIFICATE OF SERVICE

I, John E. Ferguson III, do hereby certify that copies of the foregoing Reply Comments of MCI in Opposition to the Petition for Extension of Time of Southwestern Bell Telephone Company and Pacific Bell in the Matter of Telephone Number Portability were sent, on this 16th day of March, 1998, via first-class mail, postage pre-paid, to the following:

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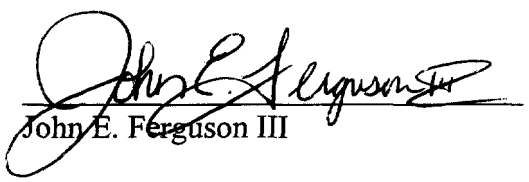

John E. Ferguson III